

IN THE UNITED STATES BANKRUPTCY COURT FOR
THE SOUTHERN DISTRICT OF MISSISSIPPI

IN THE MATTER OF:

CATHERINE MACK

CHAPTER 13 NO.:

25 - 01329 - JAW

TRUSTEE'S OBJECTION TO CONFIRMATION

COMES NOW Trustee, Harold J. Barkley, Jr., and files this his Objection to Confirmation of the Debtor's Chapter 13 Plan; and in support thereof would most respectfully show unto this Honorable Court as follows:

1. The Debtor filed a Chapter 13 Petition on May 29, 2025, and a 341(a) Meeting of Creditors was held on July 1, 2025.
2. Upon information and belief, this plan has not been filed in good faith.
3. That, the US Department of HUD filed a secured claim for which Debtor failed to provide treatment in her Plan. Debtor should be required to file a modified plan providing proper treatment of all secured claims or confirmation should be denied and this case dismissed.
4. The Trustee hereby objects to any amended plan filed hereafter.
5. Other grounds to be shown at a hearing hereon.

WHEREFORE, PREMISES CONSIDERED, Trustee prays that this Objection be received and filed and at a hearing hereon confirmation be denied and for such other, further and general relief to which the Trustee and this bankrupt estate may be entitled.

Dated: July 2, 2025

Respectfully submitted,

/s/Harold J. Barkley, Jr.
HAROLD J. BARKLEY, JR. - MSB #2008
CHAPTER 13 TRUSTEE
POST OFFICE BOX 4476
JACKSON, MS 39296-4476
PHONE: 601/362-6161 FAX: 601/362-8826
EMAIL: HJB@HBARKLEY13.COM

C E R T I F I C A T E

I, Harold J. Barkley, Jr., Trustee, do hereby certify that I have this date mailed a true and correct copy of the foregoing pleading to the following parties by United States Mail, postage prepaid or by ECF Filing Notification:

Office of the U. S. Trustee
Ustpregion05.ja.ecf@usdoj.gov

Hon. Thomas C. Rollins, Jr.
trollins@therollinsfirm.com

Catherine Mack
1421 Woodfield Drive
Jackson, MS 39211-2030

US Department of HUD
77 Forsyth Street SW
Atlanta, GA 30303

US Department of HUD
2000 N Classen Blvd. Suite 3200
Oklahoma City, OK 73106

US Attorney General
US Dept. of Justice
950 Pennsylvania Ave. NW
Washington, DC 20530-0001

Dated: July _____, 2025

/s/[Harold J. Barkley, Jr.](#) _____
HAROLD J. BARKLEY, JR.